

**BakerHostetler**

**Baker&Hostetler LLP**

45 Rockefeller Plaza  
New York, NY 10111

T 212.589.4200  
F 212.589.4201  
www.bakerlaw.com

Fernando A. Bohorquez  
direct dial: 212.589.4242  
FBohorquez@bakerlaw.com

November 27, 2019

**VIA E-MAIL**

Hon. Stuart M. Bernstein  
United States Bankruptcy Court  
One Bowling Green  
New York, NY 10004-1408

Re: *Picard v. Magnify Inc., et al.*, Adv. Pro. No. 10-05279 (SMB)

Dear Judge Bernstein:

As detailed in Mr. Berkowitz's Mediator Interim Report filed earlier today in the above referenced matter, the parties have reached a settlement in principle in this case and in one of two actions in Israel, C.C. 18907-12-15, currently before the District Court of Tel Aviv. To that end, the parties have entered and executed a confidential settlement term sheet covering both actions. The parties are working diligently to document the settlement, complete their due diligence, and finalize all related settlement documentation. However, given the multiple parties involved and the complexities arising from the international nature of the action and the negotiations, the parties will require time to prepare and finalize a settlement agreement. Accordingly, to allow the parties to focus their efforts and resources on settlement, the parties jointly respectfully request that all discovery-related deadlines be adjourned *sine die*. An agreed upon proposed Amended Case Management Plan is attached hereto reflecting this request.

Further, and pursuant to Local Bankruptcy Rule 9076-1(b) and Your Honor's Chambers Rules, the Trustee respectfully requests a conference with the Court on the omnibus hearing date of January 29, 2020 at 10:00 a.m. regarding the status of the settlement. Defendants' counsel consents to this request.

Respectfully submitted,



Fernando A. Bohorquez

Attachment

cc: Paul Weinstein, Esq., counsel for Defendants

Atlanta Chicago Cincinnati Cleveland Columbus Costa Mesa Denver  
• Houston Los Angeles New York Orlando Philadelphia Seattle Washington, DC